

[Submitting Counsel on Signature Page]

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS FILING RELATES TO:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR

Honorable Yvonne Gonzalez Rogers

**STIPULATION AND [PROPOSED]
ORDER MODIFYING SEALING
DEADLINES IN CONNECTION WITH
INDIVIDUAL PLAINTIFFS' SECOND
AMENDED MASTER COMPLAINT
(DKT. 494)**

STIPULATION

The Individual Plaintiffs and Meta Defendants¹ submit this Joint Stipulation and Proposed Order modifying the Meta Defendants' deadline to move to seal redacted material in the Individual Plaintiffs' Second Amended Master Complaint ("SAMC") (Dkt. No. 494) and stipulate as follows:

WHEREAS, on December 15, 2023, the Individual Plaintiffs filed their SAMC, which withdrew certain Counts and incorporated by reference selected paragraphs from complaints filed (1) by the Attorney General of New Mexico against the Meta Defendants and (2) by the Attorney General of Utah against the TikTok Defendants, portions of which were in turn filed under seal in their respective originating jurisdictions;

WHEREAS, the complaint filed by the Attorney General of New Mexico includes provisional redactions pursuant to this Court's Order Setting Sealing Procedures (Dkt. 341);

WHEREAS, under the Order Setting Sealing Procedures, the original deadline for Defendants to file an omnibus sealing stipulation and/or motion addressing the redacted material in the complaints filed by the Attorney General of New Mexico against the Meta Defendants was December 29, 2023 and, pursuant to the Parties' stipulation, the Court extended that deadline to January 12, 2024 (Dkt. 515);

WHEREAS, the New Mexico complaint includes a cumulative 75 pages of redactions;

WHEREAS, in light of the amount of provisionally sealed material the Meta Defendants requested, and the Individual Plaintiffs granted, the Meta Defendants an extension of the above sealing deadlines to January 17, 2024 at 5:00 PM, and the Parties agreed to extend the deadline to oppose any motion to seal to January 19, 2024 at 8:00 PM and the deadline to reply to any opposition to January 23, 2024;

WHEREAS, the Meta Defendants agree that they will provide the Individual Plaintiffs with their initial proposals on what to seal on January 12, 2024, and the Parties will meet and confer on January 15, 2024;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, SUBJECT TO THE COURT'S APPROVAL, THAT: the Meta Defendants' deadline to file omnibus sealing stipulations

¹ As used here, "Meta Defendants" refers to Defendants Meta Platforms, Inc. f/k/a Facebook, Inc.; Facebook Holdings, LLC; Facebook Operations, LLC; Facebook Payments, Inc.; Facebook Technologies, LLC; Instagram, LLC; Siculus, Inc.; and Mark Elliot Zuckerberg

1 and/or motions in connection with the Individual Plaintiffs' Second Amended Master Complaint (Dkt.
2 No. 494) is extended to January 17, 2024 at 5:00 PM, the deadline for any opposition thereto is extended
3 to January 19, 2024 at 8:00 PM, and the deadline for any reply thereto is extended to January 23, 2024.
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6 DATED: January 11, 2024

Respectfully submitted,

7 /s/ Lexi J. Hazam

8 LEXI J. HAZAM

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Instagram, LLC; Siculus, Inc.; and Mark Elliot
Zuckerberg*

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

Hon. Yvonne Gonzalez Rogers
United States District Judge

ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: January 11, 2024

By: /s/ Ashley M. Simonsen
Ashley M. Simonsen